

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

SANDRA J. WHITE ]

]

Plaintiff, ]

]

C.A. No. 06-008-KAJ

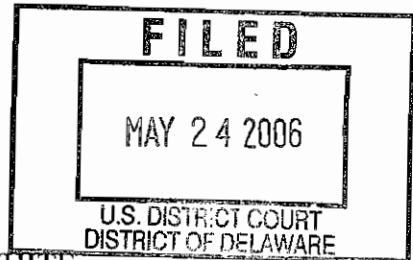
v. ]

DETECTIVE MARZEC, in his  
Official and individual capacity  
AGENT TOM JACOBS, and  
AGENT CHRIS QUAGLINO, ]

]

Defendants, ]

]



MEMORANDUM RESPONSE OF SANDRA J. WHITE

NOW Comes the plaintiff, Sandra J. White, pro se who so moves the honorable Court, with the following responses, and they go as follows;

(1). I do live and reside in the home that was illegally searched and seized, on 09-21-05, by the named defendants.

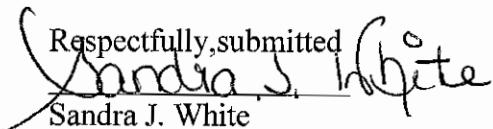
(a). I have lived there for a substantial period of time and do have man reasonable expectancy of privacy at the same property.

(2). My arrest , handcuffing and having guns pointed at me, should have never happen, because the named defendants, had no search warrant for the premises that they were at.

(a). The search warrant was for Trailer in Ellendale, labeled the Sales/ Packaging Trailer, and it fit the description of the trailer in the Search warrant Totally in (a) color (b) design and (c) location which was Ellendale Delaware.

(3). The actions of defendants was malicious intented without care for plaintiff medical condition or rights of plaintiff and should have never happen to begin with.

(a). The defendant didn't act in good-faith nor as well trained and supervised policemen.

Respectfully submitted  
  
 Sandra J. White

AFFIDAVIT OF Steve Hickman

COUNTY OF SUSSEX )

)

STATE OF DELAWARE)

I, Steve Hickman, after being duly SWORDN and  
Subscribed, before a Notary Public for the State and County Aforesaid, did depose  
And say the following:

(1). Sandra J. White is my finances mother

(2). I have know her for 13 years.

(3). She resides with me and my kids at 9008 Greentop Rd, Lincoln  
Delaware.

(a). She was living at that residence prior to the illegal search and seizure  
on 09-21-05.

Kathleen E. White

Signature & Seal of Notary

Steve Hick

Signature of affiant

AFFIDAVIT OF Tawanda Weatherspoon

COUNTY OF SUSSEX )

)

STATE OF DELAWARE)

I, Tawanda Weatherspoon, after being duly SWORDN and Subscribed, before a Notary Public for the State and County Aforesaid, did depose And say the following:

(1). Sandra J. White is my Mother.

(2). I have known her for Whole life years.

(3). She resides with me and my kids at 9008 Greentop Rd, Lincoln Delaware.

(a). She was living at that residence prior to the illegal search and seizure on 09-21-05.

Kathleen E. Wells  
Signature & Seal of Notary

Tawanda Weatherspoon  
Signature of affiant

CERTTIFICATE OF SERVICE

I, Sandra S. White, verify service of attached document  
Upon all parties listed below, and do the same with my signature, on this 22th  
Day of May, 2006, via U>S> Postal Service system.

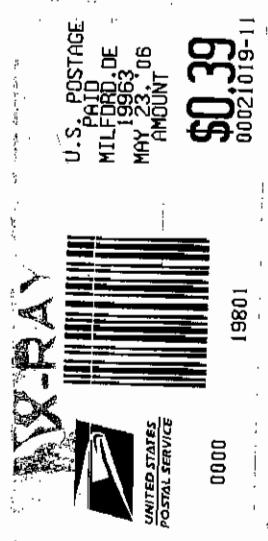
Respectfully submitted

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Lincoln DE  
19960

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Assistant U>S> Attorney  
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Steve Heckman  
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Sandra W. Butcher  
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U.S. District Court

Clerk  
Locke Cook 18  
844 King St  
Wilmington, DE

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